

**From:** [Glum, Scott](#)  
**To:** [Alan Ullman](#)  
**Subject:** RE: Environmental Issues of Proposed Gas Pipeline  
**Date:** Monday, August 27, 2018 8:57:00 AM

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Hello again Mr. Ullman. Many of the Pristine Site reports are available on U.S. EPA's website. Here is a link to the on-line file index and documents:

<https://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.ars&id=0504445&doc=Y&colid=4721&region=05&type=AR>

If you review the Remedial Investigation Report, you will see that VOCs were not the only contaminants of concern.

I also recommend that you review the Five-Year Review Reports, as they provide a good summary of site history.

-Scott

**Scott Glum**

Site Coordinator  
Ohio Environmental Protection Agency  
Southwest District Office  
Division of Environmental Response and Revitalization  
401 East Fifth Street  
Dayton, OH 45402-2911  
(937) 285-6065 (office)  
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[scott.glum@epa.ohio.gov](mailto:scott.glum@epa.ohio.gov)

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**From:** Alan Ullman <ahullman@gmail.com>  
**Sent:** Sunday, August 26, 2018 3:29 PM  
**To:** Glum, Scott <scott.glum@epa.ohio.gov>  
**Subject:** Re: Environmental Issues of Proposed Gas Pipeline

Mr. Glum,

Thank you for your prompt reply. I will follow-up with Ms. Prather concerning the other sites.

Regarding the Pristine Site, is there a report that describes the sampling and analysis procedures, including the data analysis? I'd be interested in the statistics, modeling, etc. I am also interested in any references to "safe" levels. Were VOCs the only analytes of concern?

Thank you again.

Alan Ullman

On Aug 24, 2018, at 10:40 AM, [scott.glum@epa.ohio.gov](mailto:scott.glum@epa.ohio.gov) wrote:

Dear Mr. Ullman,

Thank you for your e-mail. I am the Ohio EPA Site Coordinator for the Pristine Site. I can provide information regarding the potential impact of the proposed pipeline on the Pristine Site. However, I do not have specific knowledge about some of the other sites and issues listed in your e-mail. Therefore, I suggest that you contact the Ohio EPA Southwest District Office and request a public records review. The person to contact is Penny Prather at (937) 285-6025 or [penny.prather@epa.ohio.gov](mailto:penny.prather@epa.ohio.gov)

Also, your e-mail asks what the term "VAP" means. VAP is an acronym for the Voluntary Action Program. Information about the VAP can be found here:

<http://epa.ohio.gov/derr/volunt/volunt>

As for the Pristine Site, please see the summary provided below.

#### Site History/Background

The Pristine, Inc. Site (Site) is a former liquid waste incineration and disposal facility located in an industrialized area within the city of Reading. Past operations at the three-acre facility contaminated soil and groundwater with volatile organic compounds (VOCs) and other hazardous chemicals. The United States Environmental Protection Agency (U.S. EPA) placed the Site on the Superfund National Priorities List in 1983 and cleanup has been ongoing since 1992.

All remedial action construction activities at the Site have been completed, including treatment of contaminated soil and sediment, construction of a low permeability cap, and construction and operation of the groundwater extraction and treatment system. Groundwater extraction/treatment has been ongoing since 1997 to address contamination in the lower aquifer. The lower aquifer exists at a depth of approximately 60 to 100 feet below ground surface in the vicinity of the Site, and extends to a depth of 140 to 155 feet below ground surface.

Total concentrations of VOCs in the lower aquifer have been reduced by more than 95% due to groundwater extraction/treatment, with concentrations decreasing by orders of magnitude compared to historic maximum values. The groundwater pumping rate has been reduced over time and only two of the five extraction wells are currently active. A plume of groundwater contamination above cleanup goals still exists in the lower aquifer at the southern boundary of the Site and extends approximately 2,800 feet to the south/southwest. Monitored natural attenuation of groundwater contamination is being evaluated to determine if it should be included as part of the Site remedy.

An environmental covenant (EC) is in place at the Site which restricts property use for

industrial activities only; prohibits consumptive use of groundwater; prohibits filling, grading, excavating, building, drilling, or mining without prior authorization; and prohibits interference with cleanup remedy components.

#### U.S. EPA and Ohio EPA Involvement

U.S. EPA is the lead agency for developing and implementing the remedy for the Site. Ohio Environmental Protection Agency (Ohio EPA) is the support agency representing the State of Ohio. U.S. EPA conducted a five-year review of the cleanup remedy at the Site in 2016 and determined:

*The remedy is protective of human health and the environment. All immediate threats have been addressed; there is no evidence of exposure to Site related contaminants; and the existing Site and groundwater uses are consistent with the objectives in the remedy and Environmental Covenant.*

#### Duke Energy Pipeline

Duke Energy is proposing to construct a natural gas pipeline (Duke Energy Central Corridor Pipeline) approximately 100 feet east of the Site property boundary. Ohio Power Siting Board and PUCO have inquired with Ohio EPA about the proposed pipeline route due to the proximity to the Site, potential interference with cleanup activities, and potential issues with contaminated soil or groundwater.

Ohio EPA has reviewed the proposed pipeline route and determined that a section of the proposed pipeline along West Street in Reading may interfere with off-property Site monitoring wells, extraction wells, and underground piping connected to the extraction wells. The pipeline installers will need to locate and avoid the wells, piezometers, and underground piping in order to avoid disrupting the ongoing cleanup and monitoring activities. Ohio EPA has provided PUCO and Duke Energy with contact information for the Pristine Site engineer, who has specific knowledge about the locations of these off-property Site components.

Ohio EPA has determined that contact with contaminated soil at the Site is not an issue, as the soil contamination was limited to the three-acre Site property and was addressed by the remedy. The proposed pipeline route does not encroach on the Site property.

Ohio EPA has determined that the pipeline construction is unlikely to impact the groundwater contamination plume emanating from the Site. The depth to the lower aquifer ranges from 60 to 100 feet below ground surface near the Site. The depth of installation for the proposed pipeline is expected to be less than 20 feet below ground surface near the Site.

I hope this addresses your concerns and questions about the impact of the proposed pipeline on the Pristine Site. Please let me know if you have further questions.

-Scott

**Scott Glum**

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-----Original Message-----

From: Alan Ullman <[ahullman@gmail.com](mailto:ahullman@gmail.com)>  
Sent: Thursday, August 23, 2018 9:18 AM  
To: Glum, Scott <[scott.glum@epa.ohio.gov](mailto:scott.glum@epa.ohio.gov)>  
Subject: Environmental Issues of Proposed Gas Pipeline

Mr. Scott Glumm, Site Coordinator  
Ohio Environmental Protection Agency  
Dayton, OH 45402-2911

Dear Mr. Glum:

As you know, officials of Hamilton County referred Elizabeth Reuve-Miller to you because of some serious concerns we both have with Duke Energy's proposal to install a natural gas pipeline in residential, industrial, and commercial areas of Hamilton County. Elizabeth referred me to you.

I would appreciate your reading and responding to the issues and questions found in the attached Word document.

Alan Ullman  
Cincinnati, OH 45242-6049  
[ahullman@gmail.com](mailto:ahullman@gmail.com)



**Did You Know:** Children of parents who talk to their teens about drugs are up to 50% less likely to use. Start the conversation: [StartTalking.Ohio.Gov](http://StartTalking.Ohio.Gov)

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